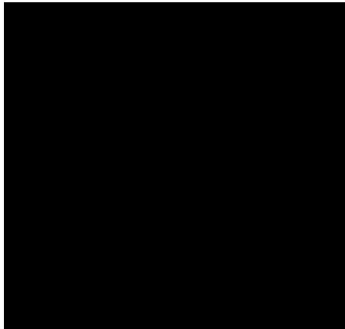


[REDACTED]

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**From:** Fowler, David  
**Sent:** 04 March 2020 15:33  
**To:** Planning  
**Subject:** FW: Planning application 2019/5882/P



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**From:** Slaney Devlin [REDACTED]  
**Sent:** 04 March 2020 13:13  
**To:** Fowler, David [REDACTED]  
**Subject:** Re: Planning application 2019/5882/P

Dear David,

Please could you make sure my objection is uploaded to the website – at the moment I can only see the air quality report.

Please could you also add to my objection that increasing the quantum of housing requires additional public as well as private open space and play space.

I am assuming the public realm in front of the new school and nursery/Plot 10 is temporary as the tarmac and grass in no way represents an improvement of quality, which was the justification for providing no additional open space in the consented scheme. The tarmac garden in what was to have been the nursery garden is also, I assume, temporary.

Regards,

Slaney Devlin  
Somers Town Neighbourhood Forum

On 24 Feb 2020, at 01:49, Slaney Devlin [REDACTED] wrote:

Dear David,

I am writing on behalf of Somers Town Neighbourhood Forum to object to the above planning application.

The Forum objects that this application is being classed as a minor material amendment/variation or removal of conditions. The Forum believes that the proposed amendments are of an extent and nature that a new planning application should be submitted.

The application is for a complete redesign of Plot 7 of the Central Somers Town CIP, planning application 2015/2704/P. The extent of the changes require a new Design and Access Statement to be submitted that is in four parts and is 56 pages long. This is not a minor amendment. The community, and particularly those neighbouring the site need to be fully consulted on the new proposals and the application should be considered by the full planning committee.

The proposed building would look completely different to that permitted. Irrespective of the reasons for this change, a key feature of the permitted tower was that it had "a degree of transparency"; "the reflectiveness of the fully glazed facades would give the building a neutrality", which has now been lost. The proposed building looks corporate and will dominate and overpower what is left of Purchase Street Open Space. Giving planting materials to new residents to green the balconies and "give the building a domestic feel" will be impossible to enforce. We object to the tower being wider than the consented scheme. However nominal the applicant believes the changes to be, any increase in size of a tower in public open space will lead to an increase in dominance over the public open space.

A significant increase in the quantum of housing is proposed: from 54 to 68 residential units. The quantum was set out in the description of the permitted scheme, so any change should not be considered a removal or variation of conditions. We note that two other redacted planning applications have recently been submitted, with no opportunity to comment, looking to vary the description of the consented scheme. (Definition (revised) of the Market Housing Units and revised definition of Plot 7.) Somers Town Neighbourhood Forum strongly objects to this process, which appears to allow unlimited changes to a planning application with no opportunity to comment.

The applicant argued during the original planning process that reducing the number of flats would lead to a loss in affordable units. There does not appear to be a revised viability statement with the current application showing an increase in affordable units. A revised, unredacted viability statement relating to the whole scheme – the Central Somers Town CIP – should be published. As this building is on public land, 50 per cent of any additional housing should be affordable, as a minimum.

The proposed image from Regent's Park shows that the tower would be more visible from agreed viewpoints. The revised scheme would harm the ability to appreciate and enjoy Regent's Park and the buildings associated with it, specifically Grade I listed Chester Terrace, which is of the highest architectural significance – significant in a European and world context. Similar increased harm will be caused to the views over the British Library and St Pancras train shed (particularly coming up Gray's Inn Road).

The energy and sustainability statement recommends connecting the tower to Somers Town Energy District Heating Network for all heating and hot water. The Forum objects strongly to additional buildings being connected to the district heating network. A report commissioned by the Forum and UCL in 2018 looked at recent air quality assessments in the Somers Town area. On the Somers Town Energy District Heating Network it concluded: The fact that the Energy Centre is going to make air quality deteriorate in an area where the AQO is already exceeded by a wide margin, **suggests that is should not have been given planning consent**. Whilst it is true that the boilers at the Energy Centre will be more efficient and have

lower NOx emissions (in g/kWh) than those it will replace, more emissions will be released in one place possibly resulting in a larger impact on air quality close to the Energy Centre than near the existing boilers. It recommends: "**no new development should be connected to Somers Town Energy**" (see pp.27-9 and 38 of the attached report by Dr Claire Holman, current chair of the Institute of Air Quality Management).

The wind study appears to show a new grove of trees on the southwest corner of the tower. Please can you upload the revised landscaping scheme for this area, which was to be outside seating for the cafe and play space for children. It is difficult to assess the impact without the relevant documents.

Regards,

Slaney Devlin  
Somers Town Neighbourhood Forum

<Somers Town air quality.pdf>